



State Affiliate of the
National Right to Life Committee, Inc.
999 E Street N.W.
Washington, D.C. 20004-2230

POLITICAL ACTION COMMITTEE

Chair

Michael Moegenburg
Sheboygan

Andrew M. Baul
Milwaukee

James Erceg
Milwaukee

Patty Tascoul
Green Bay

Al Christianson
Madison

Donald Zabulka
Oshkosh

Joanna Zabulka
Oshkosh

For Treasurer
Richard Fox

Legislative/PAC Director
Susan Armstrong

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Scott Walker
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

Dear Mr. Walker,

I am responding to your memo dated May 30, 2001 regarding our 12 day pre-general report.

You ask us to clarify a \$7,500 payment to our connected organization from our political action committee for renting lists for the 2000 elections. You point out that federal election law prohibits a corporation from contributing or expending funds for the purpose of influencing election.

Our connected organization has never expended funds in violation of federal election law. The \$7,500 payment was made by our political action committee to our connected organization in order to legally rent the connected organization's mailing list. Our connected organization may not give the mailing list to our political organization because that would amount to our connected organization making an illegal contribution to the political action committee. Therefore, the political action committee rents the list from the connected organization list at fair market value.

This transaction is legal and is the way the two organizations have handled the rental of lists for the past 15 years.

As you requested, revised Schedule D is attached. The revisions were made in red. I hope this is acceptable.

Sincerely,

Richard Fox
Treasurer

RECEIVED
FEC MAIL ROOM

2001 JUN 11 A 10:53

SCHEDULE D

(Revised 3/80)

FD 00173278

REVISED DEBTS AND OBLIGATIONS Excluding Loans

8/24/00 - 10/16/00

Page 1 of 2 for
LINE NUMBER 10
(Use separate schedules
for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
W.I. RIGHT TO LIFE P.A.C.				
A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor M.S.P. MAILING SERVICE 4950 SOUTH 6th STREET MILWAUKEE, WI.	\$6,923.00	\$0.00	0.	\$6,923.00
Nature of Debt (Purpose): DIRECT MAIL ADVOCACY / AUG 2000 FUNDRAISING				
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor WRTL - GENERAL FUND 10625 W. NORTH AVE. MILWAUKEE, WI. 53226	\$14,000.00	\$0.00	<7,000.00>	\$7,000.00
Nature of Debt (Purpose): RENTAL LIST FEE - FOR 2000 ELECTION				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor A to Z PRINTING 6535 RIVER PARKWAY WAUWATOSA, WI. 53266	0.	\$142.56	0.	\$142.56
Nature of Debt (Purpose): GENERAL ELECTION REPORTER PREP WORK				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor A to Z PRINTING 6535 RIVER PARKWAY WAUWATOSA, WI. 53266	0.	\$11,748.00	0.	\$11,748.00
Nature of Debt (Purpose): PRINTING 350A GENERAL ELECTION REPORTER				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor WRTL - GENERAL FUND 10625 W. NORTH AVE. MILWAUKEE, WI. 53226	0.	\$15.75	0.	\$15.75
Nature of Debt (Purpose): CREDIT CARD SERVICE CHARGE + TRANSFER 10/16/00				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor NEUMANN FOR U.S. SENATE SCOTT HEINTZ, TREASURER P.O. BOX 190 PEWAUKEE, WI. 53072	0.	\$2,304.16	0.	\$2,304.16
Nature of Debt (Purpose): RENTAL LIST PURCHASE FOR TELEPHONIC FUNDRAISING				
1) SUBTOTALS This Period This Page (optional)				\$28,133.47
2) TOTALS This Period (last page in this line only)				-
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				0.
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				0.

SCHEDULE D

(Revised 3/80)

REVISED
DEBTS AND OBLIGATIONS

Excluding Loans

 Page 2 of 2 for
 LINE NUMBER 19
 (Use separate schedules
 for each numbered line)

8/24/00 - 10/18/00

Name of Contributor (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
W.I. RIGHT TO LIFE P.A.C.				
A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
INSTANT MAILING SERVICE 1515 ELLIS STREET WAUKESHA, WI. 53186	0.	\$ 8,500.00	0.	\$ 8,500.00
Nature of Debt (Purpose): <u>OCT. 2000</u>				
<u>MAILING OF GENERAL ELECTION REPORTER</u>				
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
LIFE TEL, INC. 10625 W. NORTH AVE. MILWAUKEE, WI. 53226	0.	\$ 117.80	0.	\$ 117.80
Nature of Debt (Purpose):				
<u>FUNDRAISING - TELEMARKETING</u>				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
I.M.S. MAILING SERVICE 1515 ELLIS STREET WAUKESHA, WI. 53186	\$ 266.83	-	(\$ 266.83)	\$ 0.
Nature of Debt (Purpose): <u>CANDIDATE ADVOCACY</u>				
<u>JUNE '00 MAILING OF REPORTER</u>				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
WRTL - GENERAL FUND 10625 W. NORTH AVE. MILWAUKEE, WI. 53226	\$ 50.00	\$ 25.00	(\$ 75.00)	\$ 0.
Nature of Debt (Purpose):				
<u>3 MOS. WEB SITE HOSTING - CANDIDATE ADVOCACY</u>				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
A to Z PRINTING 6535 RIVER PARKWAY WAUWATOSA, WI. 53226	\$ 562.32	-	(\$ 562.32)	\$ 0.
Nature of Debt (Purpose): <u>"VOTE SMART 2000"</u>				
<u>PRINTING FUNDRAISING MTLF.</u>				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):				

1) SUBTOTALS This Period This Page (optional)

\$ 6,717.80

2) TOTALS This Period (last page in this line only)

\$ 34,951.27

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)

\$ 0.

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)

\$ 0.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Richard J. Fox, Treasurer
Wisconsin Right to Life Political
Action Committee
10625 W. North Avenue
Milwaukee, WI 53226

MAY 30 2001

Identification Number: C00173278

Reference: 12 Day Pre-General Report (8/24/00-10/18/00)

Dear Mr. Fox:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

*SEE LETTER
FOR EXPLANATION*

Schedule B of your report discloses a \$7,500 payment to your connected organization for rental list fees for 2000 Elections (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

*SEE REMARKS
SERIES VIE D
IN RES*

The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the outstanding balance beginning the period of the next report. This report shows a beginning outstanding balance(s) to M.S.P. Mailing Service, WRTL - General Fund, and A to Z Printing, which is not identical to the ending outstanding balance(s) for the creditor(s) on the 12 Day Pre-Primary Report (7/1/00-8/23/00). Please amend your report to clarify the discrepancy.

*SEE REVISIONS
SCHEDULE
D TO RES*

-On Schedule D of your previous report, you disclosed a debt(s) owed to I.M.S. Mailing Service and WRTL General Fund. This obligation(s), however, has been omitted from this report. Please amend your report to include this debt(s) on Schedule D and Line 10 of the Summary Page. All debts and obligations must be disclosed until extinguished. 11 CFR §104.11

OK

-For your information, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A.

*Amend "C"
To ID #*

-Be advised that you have used an incorrect committee identification number on the Summary Page of your report(s). Please file all future reports and correspondence using your correct identification number, C00173278, to avoid potential errors in entering your reports onto the public record.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Scott Walker
Reports Analyst
Report Analysis Division

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

☐ Hand Delivered Date of Receipt

☒ First Class Mail POSTMARKED

☐ Registered/Certified Mail POSTMARKED (R/C)

☒ No Postmark

☐ Postmark illegible

☐ Received from the House office of Records and Registration Date of Receipt

<input type="checkbox"/>	Received from the Senate Office of Public Records	Date of Receipt
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Other (Specify): _____ Postmarked
and/or Date of Receipt

☐ Electronic Filing

PREPARED BY: 5/11/12

6-11-61
DATE PREPARED